

Court File No. T-306-22

# **FEDERAL COURT**

**BETWEEN:**

**CANADIAN FRONTLINE NURSES AND KRISTEN NAGLE**

**Applicants**

**and**

**ATTORNEY GENERAL OF CANADA**

**Respondent**

## **AFFIDAVIT OF TOM MARAZZO**

I, TOM MARAZZO, currently unemployed, of the Township of Loyalist, in the County of Lennox and Addington, in the Province of Ontario SWEAR THAT:

1. I was a volunteer and a peaceful participant in the Freedom Convoy 2022 protest in Ottawa and as such have personal knowledge of the facts and matters hereinafter deposed to, save and except where same are stated to be based upon information or belief, and where so stated, I verily believe the same to be true.
2. I am a retired officer of the Canadian Armed Forces. I was employed as a software development instructor with Georgian College until I was fired “with cause” for questioning the College’s vaccination policy in September 2022. I am presently unemployed.

3. I am not a trucker. I do not own a truck. I did not park a truck in the City of Ottawa at any time.
4. I arrived in Ottawa on Sunday, January 30, 2022 with the intention of peacefully participating in the Freedom Convoy 2022 protest. I stayed in Ottawa and peacefully participated in the Freedom Convoy 2022 protest until February 22, 2022.
5. I support the Freedom Convoy 2022 movement and its goals to peacefully assemble and express opposition to unreasonable government COVID-19-related mandates, including those imposed by the federal government. The Freedom Convoy 2022 protest in Ottawa aimed at raising public awareness about the adverse impact of these COVID-19-related mandates.
6. I know Kristen Nagle of Canadian Frontline Nurses, one of the Applicants in this proceeding. I have been aware of Ms. Nagle and Canadian Frontline Nurses' opposition to unreasonable government imposed COVID-19 mandates since January 2021. I interacted with Ms. Nagle and Canadian Frontline Nurses during our joint participation in the peaceful Freedom Convoy 2022 protests in Ottawa.
7. In the beginning, I supported the peaceful Freedom Convoy 2022 protests by serving as an informal liaison between the participants of the Freedom Convoy 2022 protests and the Ottawa Police. My goal was to coordinate with the Ottawa Police and the participants in the Freedom Convoy 2022 protest, including the truckers, to ensure that a lane was free on all streets where protests were taking place to allow for the safe passage of emergency service vehicles.

8. Starting in and around February 7, 2022, I began making statements which were videotaped and broadcast through various social media platforms. In some of these videotaped statements, I voiced my opposition to government-imposed COVID-19-related mandates that I viewed as unreasonable. In some of these videotaped statements, I voiced my opposition to how the government and authorities were reacting to the peaceful Freedom Convoy 2022 protest in Ottawa.
9. On either February 12, 2022 or February 13, 2022, an individual who recognized me from social media approached me and handed me cash and asked that I provide it to the truckers. I provided the cash that I was given by this individual to the truckers. I did not directly provide cash to the truckers after February 13, 2022.
10. I did not commit any criminal acts over the course of my participation in the Freedom Convoy 2022 protest in Ottawa. To the best of my knowledge, I have not been charged with any offences under the *Criminal Code* or the *Emergencies Measures Regulations*.
11. I did not impede the movement of people or goods at any time during my participation in the Freedom Convoy 2022 protest in Ottawa. In fact, and as I have deposed above, I made active efforts to ensure that emergency vehicles could pass unimpeded in the protest zone.
12. As the Freedom Convoy 2022 protest in Ottawa progressed, I became a *de facto* internal liaison for various participants in this protest for a time. I came to know what the needs of various individuals and groups who were participating in the Freedom Convoy 2022 protest in Ottawa were, and I also developed an understanding of which groups or individuals could assist in fulfilling those needs. For example, some truckers required money for their

truck payments. I would assist those truckers in order for them to get in contact with the groups on the ground at Freedom Convoy 2022 protest in Ottawa who were fundraising and collecting cash donations from the public. Some truckers required fuel. I would help connect these truckers with the individuals who could furnish the fuel they needed.

13. On February 18, 2022, I discovered that all my bank accounts were frozen. These accounts were maintained by the Bank of Montreal.

14. On February 18, 2022, I also learned that my credit card was cancelled. On this day, I was also advised by my spouse that her credit rating had dropped 109 points. My wife's credit score has not been restored to its pre-February 18, 2022 state as of the time of my swearing of this Affidavit.

15. While I was in Ottawa participating in the peaceful Freedom Convoy 2022 protest, my ex-wife telephoned me and advised me that she had tried to use a credit card that was on file at the pharmacy to pay for my son's heart medication. She advised me that the credit card did not work. This made me very upset.

16. I understand and believe that the actions which I've outlined in paragraphs 13-15 occurred because of the government's invocation of the *Emergencies Act*. I am not aware of any other explanation for why these events occurred.

17. The freezing of bank accounts in the wake of the government's invocation of the *Emergencies Act* has left me real concern that the authorities are surveilling me and may arbitrarily charge and arrest me although I have committed no crime. I am now constantly looking over my shoulder. I am hesitant to leave my house. I have left my home only

twice since I returned from Ottawa. I am concerned about travelling with my children as I am concerned they will be taken away from me by CAS in the event that the police decide to charge and arrest me.

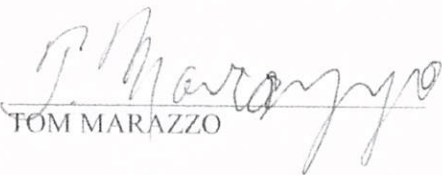
18. As a result of what has occurred to me and my family, I am concerned about being involved in any aspects of fundraising, either directly or indirectly, for organizations that oppose government vaccine mandates, including Canadian Frontline Nurses.

19. I make this Affidavit in support of the Applicants' Application for Judicial Review and for no other or improper purpose.

Sworn before me remotely by Tom Marazzo, of the Township of Loyalist, Ontario before me in the City of Toronto, Ontario on March 4, 2022.



Alexander Boissonneau-Lehner  
Commissioner for Taking Affidavits  
(or as the case may be)

  
TOM MARAZZO